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November 12, 2003

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Thomas M. Dorman
Executive Director
Public Service Commission
P. O. Box 615
211 Sower Blvd.
Frankfort, KY 40602

IN RE: Case No. 2002-00042
Investigation into Warren County Water District's
Rate Schedule for Services with Private Fire
Protection Facilities

Dear Mr. Dorman:

Enclosed is the original and 11 copies of a MOTION TO INTERVENE and a tendered ORDER sustaining the motion, which I am tendering on behalf of my client, Barren River Development Council, which is a non-profit corporation in Bowling Green currently being assessed fees by the Warren County Water District relating to a private fire protection system.

If you would, please file stamp one of these copies, and return it to me in the envelope that I have enclosed for your convenience.

Should you have any questions, please feel free to contact me.

Very truly yours,



Timothy C. Edelen

TLE/sml

Enclosure

Cc: Jack Eversole

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN INVESTIGATION INTO WARREN COUNTY)	CASE NO.
WATER DISTRICT'S RATE SCHEDULE FOR)	2002-00042
SERVICES WITH PRIVATE FIRE PROTECTION)	
FACILITIES)	

**MOTION FOR BARREN RIVER
DEVELOPMENT COUNCIL TO INTERVENE**

Comes the Barren River Development Council ("BRDC"), by counsel, pursuant to 807 KAR 5:001 Section 3(8), and moves the Commission for leave to intervene in the above action. BRDC is seeking **full intervention rights**. As grounds for this motion, BRDC states as follows:

1. BRDC is a nonprofit corporation organized to own property which it leases to the Barren River Area Development District at 177 Graham Avenue, in Bowling Green, Kentucky.

2. BRDC has a special interest in this administrative action which may not be otherwise adequately represented. Full intervention by BRDC will enable it to present issues and develop facts that should assist the Commission in fully considering this matter. Full intervention by BRDC will not unduly complicate or disrupt this proceeding.

3. BRDC owns a facility which has been subjected, and is continuing to be subjected, to water rates for sprinkler and sprinkler meters charged by Warren County Water District, which rates BRDC considers to be excessive and wholly unrelated to the service being provided by the Warren County Water

District, and consequently BRDC has an interest in the final decision in this administrative action.

4. BRDC wishes to be allowed to assert its position and be a participant in the above action, as well as to be subject to the rulings of the PSC herein.

5. BRDC requests that it be permitted to intervene as a party in this administrative action to the fullest extent permitted by law and the applicable regulations of the Commission, so that BRDC will be served with any Commission Orders, responses to any Commission Orders, filed testimony, exhibits, pleadings, orders, correspondence and other documents submitted by all parties and by the Commission. BRDC also requests to be certified as a party for the purpose of receiving service of any petition for rehearing or petition for judicial review.

WHEREFORE, the Barren River Development Council respectfully requests that it be permitted to intervene in this case and that it be granted full intervention status.

This 12 day of November, 2003.

TIMOTHY L. EDELEN
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1010 COLLEGE STREET
P. O. BOX 738
BOWLING GREEN, KY 42102-0738
PHONE: 270-781-8111
FAX: 270-781-9027



Attorney for Barren River Development Council

This is to certify that a true and exact copy of the foregoing has this day been mailed to:

John David Cole, Sr.
Cole & Moore
P. O. Box 10240
Bowling Green, KY 42102-7240

Joe Liles
Warren County Water District
523 US Highway 31-W Bypass
Bowling Green, KY 42128

David Edward Spenard
Assistant Attorney General
1024 Capitol Center Drive
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Carryn Lee
400 Parsons Lane
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Dixie R. Satterfield
Satterfield Law Office
P. O. Box 9970
Bowling Green, KY 42102-9970

This 12 day of November, 2003.



Attorney for Barren River Development Council

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN INVESTIGATION INTO WARREN COUNTY)	CASE NO.
WATER DISTRICT'S RATE SCHEDULE FOR)	2002-00042
SERVICES WITH PRIVATE FIRE PROTECTION)	
FACILITIES)	

**ORDER ALLOWING BARREN RIVER
DEVELOPMENT COUNSEL TO INTERVENE**

This matter arising upon the motion of Barren River Development Counsel ("BRDC"), by counsel, filed _____, 2003, for full intervention, and it appearing to the Commission that such intervention is likely to present issues and develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings, and this Commission being otherwise sufficiently advised,

IT IS HEREBY ORDERED that:

1. The motion of BRDC to intervene is GRANTED.
2. The BRDC shall be entitled to the full rights of a party and shall be served with the Commissioner's orders, and with filed testimony, exhibits, pleadings, correspondence and all other documents submitted by parties after the date of this Order.
3. Should the BRDC file documents of any kind with the Commission in the course of these proceedings, it shall also serve a copy of said documents on all other parties of record.

Done at Frankfort, Kentucky this ____ day of November, 2003.

BY: _____
Public Service Commission

Attest: _____
Executive Director

Tendered by:
Timothy L. Edelen

Send copies to:

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Cole & Moore
P. O. Box 10240
Bowling Green, KY 42102-7240

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